

DOCKET SECTION
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 1997

Docket No. R97-1
OFFICE OF THE CLERK

NEWSPAPER ASSOCIATION OF AMERICA
REQUEST FOR ADMISSIONS FROM THE
UNITED STATES POSTAL SERVICE
(NAA/USPS-RFA-1-6)
February 17, 1998

The Newspaper Association of America hereby submits the following Requests for Admission, pursuant to rule of practice 27, to the United States Postal Service and respectfully requests a timely and full response.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

February 17, 1998


William B. Baker

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NAA/USPS-RFA-1. Please admit the existence of a document entitled "United States Postal Service 1998 Marketing Plans" of which the attached is a copy of the cover page. If you cannot completely confirm, please explain.

United States Postal Service

1998 Marketing Plans

- ☒ **Creating Unique Customer Value**
- ☒ **Becoming a 21st Century Growth Company**



October 1997

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NAA/USPS-RFA-2. Please admit that the following passage appears on page

AD Page 11 of the document referenced in NAA/USPS-RFA-1:

Newspapers are the major, direct competitors for advertising mail dollars. Newspapers derive about 80 percent of their total revenue from advertising, the majority of which is local (retail) advertising.

NAA/USPS-RFA-3. Please admit that the following passage appears on page

AD Page 11 of the document referenced in NAA/USPS-RFA-1:

Pre-printed inserts have been and will continue to be the single newspaper application which is most vulnerable to diversion to Ad Mail.

NAA/USPS-RFA-4. Please admit that the following passage appears on page

AD Page 12 of the document referenced in NAA/USPS-RFA-1 under the heading

"Alternate Delivery":

Newspapers account for about 70 percent of all alternate delivery companies operating today. This is not a profitable business for them.

NAA/USPS-RFA-5. Please admit that the following passage appears on page

AD Page 40 of the document referenced in NAA/USPS-RFA-1 under the heading "Two-

Day Window":

Description

This is intended to test our ability to go beyond the basic service improvement process and establish specific delivery windows for qualified mailings. Certain sophisticated mailers already achieve this on a regular basis by working very closely with the Postal Service.

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NAA/USPS-RFA-6. Please admit that the following passage appears on page
AD Page 40 of the document referenced in NAA/USPS-RFA-1 under the heading "Two-
Day Window":

Objectives

Ultimately to establish "day certain" delivery for selected categories of Ad Mail,
and create the platform for moving substantial revenues from pre-printed
newspaper inserts to mail